

R E M A R K S

Reconsideration of this application, as amended, is respectfully requested.

THE CLAIMS

Claims 1, 2, 4, 6, 7 have been amended to replace the recitations of a "storage area" with a "folder" as supported by the disclosure in the specification at, for example, page 21, line 12 to page 22, line 3. See also Fig. 5, items 52 and 53. In addition, claim 4 has also been amended to clarify that the first and second folders are in a memory of the computer, as already recited in claim 7.

Claims 1, 4, 6 and 7 have also been amended to make some additional minor clarifying amendments.

No new matter has been added, and it is respectfully submitted that the amendments to the claims are clarifying in nature only. Accordingly, it is respectfully requested that the amendments to the claims be approved and entered under 37 CFR 1.116.

THE PRIOR ART REJECTION

Claims 1, 4, 6 and 7 were rejected under 35 USC 103 as being obvious in view of unpatentable over USP 6,774,939 ("Peng"), US 2003/0055905 ("Nishiyama et al"), and US 2003/0011687 ("Imura

et al"); and claims 2, 3 and 5 were rejected under 35 USC 103 in view of the combination of Peng, Nishiyama et al and Imura et al with one of US 2003/0167287 ("Forster"), US 2003/0018777 ("Miller et al") and US 2002/0057457 ("Nozaki et al"), respectively.

These rejections, however, are respectfully traversed.

As explained in the Amendment filed on December 13, 2007, and as recognized by the Examiner, Peng discloses linking audio data and image data, and storing the audio data and image data. As a storage area for storing audio data and image data linked thereto, the Examiner has referred to memory 120 of Peng. It was asserted in the Amendment filed on December 13, 2007, that the memory 120 of Peng does not suggest first and second storage areas as recited in claims 1 and 4.

In response, the Examiner asserts on pages 2-3 of the Final Office Action that "storage area" is a "very broad" term, and that each file stored according to Peng can be considered a storage area.

Accordingly, independent claims 1, 4 and 7 have been amended to more clearly recite first and second folders, wherein audio data and image data that is linked thereto are stored in the first folder, and wherein image data not linked to audio data is stored in the second folder. And it is respectfully submitted that the memory 120 of Peng clearly fails to suggest first and

second folders as recited in amended independent claims 1, 4 and 7.

In addition, it is respectfully submitted that even if the Examiner's interpretation of Peng such that each file is considered a "storage area" were reasonable, the Examiner's interpretation of Peng is not applicable to the recitation of first and second folders recited in amended independent claims 1, 4 and 7.

Still further, it is respectfully submitted that the other cited references also do not disclose, teach or suggest these features of amended independent claims 1, 4 and 7.

Indeed, as explained in the Amendment filed on December 13, 2007, according to Nishiyama et al, image data and sound data are stored in separate directories whether or not the sound data and the image data are linked. See Fig. 2 of Nishiyama et al, in which even though the sound data enclosed with a box is linked to image data (see paragraph [0025], for example), the sound data is stored in a separate directory (the "<Sound>" directory in Fig. 2) from the image data (which is stored in the "<Picture>" directory in Fig. 2).

Accordingly, it is respectfully submitted that even if considered in combination, Peng and Nishiyama et al do not suggest first and second folders, wherein audio data and image data that is linked thereto are stored in the first folder, and

wherein image data not linked to audio data is stored in the second folder, as recited in amended independent claims 1, 4 and 7. (Claims 1 and 4 explicitly recite, moreover, that no audio data is stored in the second folder.)

Yet still further, it is respectfully submitted that the cited references clearly fail to disclose or fairly suggest moving means for moving the image data, from which the link is canceled, from the first folder to the second folder when the link is canceled by the link release means, as recited in claim 1, or the corresponding recitations of claims 4 and 7.

The Examiner asserts that Imura et al discloses a function of moving an image file from one storage area to another storage area. However, the moving function recited in Imura et al moves photographic information files stored in an ordinary folder to a special folder created for a specific purpose such as erase-prohibition, printing and transferring of image files.

It is respectfully submitted that the function disclosed by Imura et al (of moving image data to a folder different from the ordinary folder for a specific processing purpose) clearly differs from a function of moving image data from which a link (between the image data and audio data) has been canceled from a first folder (in which audio data and image data are linked to each other) to a second folder (which stores image data not linked to audio data) when the link is canceled.

And it is respectfully submitted that Imura et al does not disclose, teach or suggest that the movement of image data is performed when a link is canceled between the image data and audio data, or that the movement is performed to move the image data from a first folder which stores audio data and image data linked thereto to a second folder which stores image data not linked to audio data.

In view of the foregoing, it is respectfully submitted that amended independent claims 1, 4 and 7, and claims 2, 3, 5 and 6 depending from claim 1, all clearly patentably distinguish over Peng, Nishiyama et al and Imura et al, taken singly or in any reasonable combination consistent with the respective fair teachings thereof, under 35 USC 103.

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Entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned for prompt action.

Respectfully submitted,

/Douglas Holtz/

Douglas Holtz
Reg. No. 33,902

Frishauf, Holtz, Goodman & Chick, P.C.
220 Fifth Avenue - 16th Floor
New York, New York 10001-7708
Tel. No. (212) 319-4900

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